

(c) Claims 4, 13, 23 and 32 are rejected as being unpatentable over Yamada '629 and Yamazaki '652 and further in view of Choi et al. (US 6,583,577).

Each of these rejections is respectfully traversed.

More specifically, the Examiner rejects all of the pending claims as being anticipated or unpatentable over Yamada. However, as shown below, Yamada clearly does not disclose or suggest all of the claimed elements of the independent claims.

In particular, independent Claims 1, 9, 19, and 28 recite “an insulating layer for sealing the EL element.” On page 2 of the Final Rejection, the Examiner contends that Yamada discloses “an insulating layer (14c, see col. 7, lines 57-66) for sealing the EL element.” Applicants respectfully disagree that Yamada discloses or suggests this claimed element.

Interlayer insulating film 14c is shown in Fig. 4 in Yamada. As shown in Fig. 4, interlayer insulating film 14c is covered by EL element 11. Film 14c does not seal EL element 11, as required in the claims of the present application.

In the Response To Arguments in the Final Rejection on pages 5-6, the Examiner agrees that insulating film 14c is covered by EL element 11 but states “thus means the insulating film 14c seals the EL element of the display system.” The Examiner’s interpretation, however, is inconsistent with the well known and understood meaning of the word “seal.”

For example, the dictionary meaning of the verb “seal” is “3a: to fasten with or as if with a seal to prevent tampering b: to close or make secure against access, leakage or passage by fastening or coating.” See Webster’s Collegiate Dictionary Tenth Edition, 1996, p. 1052 (copy attached). One skilled in the art would clearly understand the word “sealing” in the claims of the present application to have the dictionary meaning above. As explained in the specification, the insulating film is intended to protect the EL element and hence, is for sealing the EL element.

In contrast, insulating 14c clearly does not “seal” EL element 11 since EL element 11 is located above and covers insulating film 14c.

Accordingly, Yamada (and the other cited references) does not disclose or suggest an insulating layer for sealing the EL element, as recited in independent Claims 1, 9, 19 and 28 of the present application. Therefore, these independent claims and the claims dependent thereon are patentable over the cited references.

Furthermore, independent Claims 9 and 28 recite the feature that “the thin film transistor, the pixel electrode, the EL element, the insulating layer, the applying means and the correcting means are formed over a same substrate.” Applicant pointed this omission out in the last response to an action by the Examiner. The Examiner, however, still does not mention this claimed feature in his rejection nor where the cited references allegedly disclose or suggest this feature. Hence, the Examiner has failed to show how the cited references disclose all of the features of the claimed invention, and the rejection of these claims is insufficient and defective.

Accordingly, it is respectfully requested that all of these rejections of the pending claims be withdrawn.

#### Information Disclosure Statement

Applicant filed an information disclosure statement (IDS) on May 2, 2006. It is respectfully requested that this IDS be entered and considered prior to the issuance of any further action on this application.

If any further fee is due for this IDS, please charge our deposit account 50/1039.

#### Interview Request

The undersigned requests a telephone interview with the Examiner, prior to the issuance of any further action in this application, to discuss this application. The undersigned will call the Examiner to arrange the telephone interview.

Conclusion


It is respectfully submitted that the present application is in a condition for allowance and should be allowed.

Please charge our deposit account 50/1039 for any fee due for this response.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

Dated: June 29, 2006

  
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# Merriam-Webster's Collegiate<sup>®</sup> Dictionary

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## 1052 scuttle o sea lily

thing (as grain or garden produce). 2: a metal pail that usu. has a bail and a sloped lip and is used esp. for carrying coal

**scuttle** *n* [ME *skottell*] (15c) 1: a small opening in a wall or roof furnished with a lid: as a: a small opening or hatchway in the deck of a ship large enough to admit a person and with a lid for covering it b: a small hole in the side or bottom of a ship fitted with a covering or glazed 2: a covering that closes a scuttle

**scuttle** *vi* **scut-tled**; **scut-ting** \skut-lip, 'sko-tl-in\ (1642) 1: to cut a hole through the bottom, deck, or side of (a ship); **specif**: to sink or attempt to sink by making holes through the bottom 2: DESTROY. WRECK; also: SCRAP 2

**scuttle** *n* [perh. blend of *scud* and *shuttle*] (1623) 1: a quick shuffling pace 2: a short swift run

**scuttle** *vi* **scut-tled**; **scut-ting** \skut-lip, 'sko-tl-in\ (1657) 1: SCURRY

**scut-tle-butt** \sko-tl-, -bət\ *n* [*scuttle* + *butt*] (1805) 1: a cask on shipboard to contain fresh water for a day's use b: a drinking fountain on a ship or at a naval or marine installation 2: RUMOR, GOSSIP

**scu-tum** \sku-təm, 'skyu-ə\ *n*, *pl* scu-ta \-tə\ [NL, fr. L, shield — more at ESQUIRE] (1771): a bony, horny, or chitinous plate: SCUTE

**scut work** \skut-ə\ *n* [prob. fr. medical argot *scut* junior intern] (ca. 1962): routine and often menial labor

**scuz-zz** \sko-zē\ *adj* **scuz-zz-er**; -est [origin unknown] (1969) *slang* 1: dirty, shabby, or foul in condition or character

**Scylla** \si-lə\ *n* [L, fr. Gk *Skylle*] 1: a nymph changed into a monster in Greek mythology who terrorizes mariners in the Strait of Messina — between *Scylla* and *Charybdis*: between two equally hazardous alternatives

**scy-pho-to-ma** \si-fis-tə-miə\ *n*, *pl* -mae \-(mē)\ also -mas [NL, fr. L *scyphus* cup + Gk *stoma* mouth — more at STOMACH] (1878): a sexually produced scyphozoan larva that ultimately repeatedly constricts transversely to form free-swimming medusae

**scy-pho-zo-an** \si-fə-zə-ən\ *n* [NL *Scyphozoa*, fr. L *scyphus* + NL -zoa] (ca. 1909): any of a class (Scyphozoa) of coelenterates that comprise jellyfishes lacking a true polyp and usu. a velum — *scyphozoan* *adj*

**scythe** \sith, 'sɪ\ *n* [ME *sihte*, fr. OE *sihte*; akin to OE *sagu* saw — more at SAW] (bef. 12c): an implement used for mowing (as grass) and composed of a long curving blade fastened at an angle to a long handle

**scythe** *vb* **scythed**; **scything** *vi* (ca. 1580): to use a scythe ~ *vt*: to cut with or as if with a scythe

**Scythian** \si-thē-ən, -thē-ən\ *n* [L *Scythia*, fr. Gk *Skýthēs*] (15c) 1: a member of an ancient nomadic people inhabiting Scythia 2: the Iranian language of the Scythians — *Scythian* *adj*

**sea** \se\ *n* [ME *see*, fr. OE *sæ*, akin to OHG *sē* sea, Goth *saiws*] (bef. 12c) 1: a: a great body of salty water that covers much of the earth; **broadly**: the waters of the earth as distinguished from the land and air b: a body of salt water of second rank more or less landlocked (the Mediterranean ~) c: OCEAN d: an inland body of water — used esp. for names of such bodies (the Caspian Sea) (the Sea of Galilee) 2: a: surface motion on a large body of water or its direction; also: a large swell or wave — often used in pl. (heavy ~s) b: the disturbance of the ocean or other body of water due to the wind 3: something likened to the sea esp. in vastness (the crowd was a ~ of faces) 4: the seafaring life 5: MARE — *sea* *adj* — at sea 1: on the sea; **specif**: on a sea voyage 2: LOST, BEWILDERED — to sea: to or on the open waters of the sea

**sea anchor** *n* (1769): a drag typically of canvas thrown overboard to retard the drifting of a ship or seaplane and to keep its head to the wind

**sea anemone** *n* (1742): any of numerous usu. solitary anthozoan polyps (order Actiniaria) whose form, bright and varied colors, and cluster of tentacles superficially resemble a flower

**sea-bag** \sē-, bæg\ *n* (1919): a cylindrical canvas bag used esp. by a sailor for clothes and other gear

**sea bass** *n* (1765) 1: any of numerous marine bony fishes (family Serranidae) that are usu. smaller and more active than the groupers; **esp**: a food and sport fish (*Centropomus striata*) of the Atlantic coast of the U.S. 2: any of numerous croakers or drums including noted sport and food fishes

**sea-bed** \sē-, bed\ *n* (1838): the floor of a sea or ocean

**Sea-bee** \sē-, bee\ *n* [alter. of *see* + *bee*; fr. the initials of *construction battalion*] (1942): a member of one of the U.S. Navy construction battalions for building naval shore facilities in combat zones

**sea-bird** \sē-, bərd\ *n* (1589): a bird (as a gull or albatross) frequenting the open ocean

**sea biscuit** *n* (ca. 1690): HARDTACK 1

**sea-board** \sē-, bōrd, -bōrd\ *n* (1788): SEACOAST; also: the country bordering a seacoast — **seaboard** *adj*

**sea-boot** \sē-, büt\ *n* (1851): a very high waterproof boot used esp. by sailors and fishermen

**sea-borg-lum** \sē-, bōr-gē-əm\ *n* [NL, fr. Glenn T. Seaborg] (1994): UNILHEXIM

**sea-borne** \sē-, bōrn, -bōrn\ *adj* (1823) 1: borne over or on the sea (a ~ invasion) 2: carried on by overseas shipping (~ trade)

**sea bream** *n* (ca. 1530): any of numerous marine bony fishes (as of the family Sparidae)

**sea breeze** *n* (1697): a cooling breeze blowing generally in the daytime inland from the sea

**sea captain** *n* (1612): the master esp. of a merchant vessel

**sea change** *n* (1610) 1 *archaic*: a change brought about by the sea 2: a marked change: TRANSFORMATION

**sea chest** *n* (1669): a sailor's storage chest for personal property

**sea-coast** \sē-, kōst\ *n* (14c): the shore or border of the land adjacent to the sea

**sea cow** *n* (1613): SIRENIAN

**sea-craft** \sē-, krafft\ *n* (1727) 1: skill in navigation 2: seagoing ships

**sea crayfish** *n* (1601): SPINY LOBSTER

**sea cucumber** *n* (1601): any of a class (Holothuriodea) of echinoderms having a tough muscular elongate body with tentacles surrounding the mouth — called also *holothurian*

**sea devil** *n* (1634): DEVILFISH 1

**sea dog** *n* (1823): a veteran sailor

**sea duck** *n* (1753): a diving duck (as a scoter, merganser, or eider) that frequents the sea

**sea duty** *n* (1946): duty in the U.S. Navy performed with a deployable unit (as a ship or aircraft squadron)

**sea eagle** *n* (1668): any of various fish-eating eagles (esp. genus *Haliaeetus*)

**Sea Explorer** *n* (1948): an Explorer in a scouting program that teaches seamanship

**sea fan** *n* (1633): a gorgonian with a fan-shaped skeleton; **esp**: one (*Gorgonia flabellum*) of Florida and the West Indies

**sea-far-er** \sē-, far-, -er\ *n* [sea + far + -er] (1513): MARINER

**sea-far-ing** \sē-, far-, -ing\ *n* (1592): the use of the sea for travel or transportation — **seafaring** *adj*

**sea fire** *n* (1814): marine bioluminescence

**sea-floor** \sē-, flōr, -flōr\ *n* (1855): SEABED

**sea-food** \sē-, fud\ *n* (1836): edible marine fish and shellfish

**sea-fowl** \sē-, faul\ *n* (14c): SEABIRD

**sea-front** \sē-, frənt\ *n* (1879): the waterfront of a seaside place

**sea-girt** \sē-, gərt\ *adj* (1616): surrounded by the sea

**sea-go-ing** \sē-, gō-, -ing\ *adj* (1828): OCEANGOING

**sea grape** *n* (1806): a tree (*Coccoloba uvifera*) of the buckwheat family that inhabits sandy shores from Florida to So. America, has rounded leaves, and bears clusters of purple to whitish edible berries

**sea grass** *n* (1578): any of various grasslike plants that inhabit coastal areas; **esp**: EELGRASS 1

**sea green** *n* (1598) 1: a moderate green or bluish green 2: a moderate yellow green

**sea-gull** \sē-, gəl\ *n* (1542): a gull frequenting the sea; **broadly**: GULL

**sea hare** *n* (1593): any of various large opisthobranch mollusks (esp. genus *Aplysia*) that have an arched back and two anterior tentacles and have the shell much reduced or missing

**sea holly** *n* (1548): a European coastal herb (*Eryngium maritimum*) of the carrot family with spiny leaves and pale blue flowers

**sea horse** *n* (ca. 1500) 1: WALRUS 2: a mythical creature half horse and half fish 3: any of a genus (*Hippocampus*) of the family Syngnathidae of small bony fishes that have the head angled downward toward the body which is carried vertically and are equipped with a prehensile tail

**sea island cotton** *n*, often *cap* S&I [Sea Islands, chain of islands off the southeastern U.S. coast] (1805): a cotton (*Gossypium barbadense*) with esp. long silky fiber — called also *sea island*

**sea kale** *n* (1699): a succulent Eurasian perennial herb (*Crambe maritima*) of the mustard family used as a potherb

**sea king** *n* (1819): a Norse pirate chief

**seal** \sē-, ə\ *n*, *pl* seals also seal [ME *sele*, fr. OE *seolh*; akin to OHG *selah* seal] (bef. 12c) 1: any of numerous carnivorous marine mammals (families Phocidae and Otariidae) that live chiefly in cold regions and have limbs modified into webbed flippers adapted primarily to swimming; **esp**: a fur seal or hair seal as opposed to a sea lion 2: a: the pelt of a fur seal b: leather made from the skin of a seal 3: a dark brown

**seal** *vi* (1828): to hunt seals

**seal** *n* [ME *sele*, fr. OF, fr. L *sigillum* seal, fr. dim. of *signum* sign, seal — more at SIGN] (13c) 1: a: something that confirms, ratifies, or makes secure: GUARANTEE, ASSURANCE b (1): a device with a cut or raised emblem, symbol, or word used esp. to certify a signature or authenticate a document (2): a medallion or ring face bearing such a device incised so that it can be impressed on wax or moist clay; also: a piece of wax or a wafer bearing such an impression c: an impression, device, or mark given the effect of a common-law seal by statute law or by American local custom recognized by judicial decision d: a usu. ornamental adhesive stamp that may be used to close a letter or package; **esp**: one given in a fund-raising campaign 2: a: something that secures (as a wax seal on a document) b: a closure that must be broken to be opened and that thus reveals tampering c (1): a tight and perfect closure (as against the passage of gas or water) (2): a device to prevent the passage or return of gas or air into a pipe or container 3: a seal that is a symbol or mark of office — **under seal**: with an authenticating seal affixed

**seal** *vt* (14c) 1: a: to confirm or make secure by or as if by a seal b: to solemnize for eternity (as a marriage) by a Mormon rite 2: a: to set or affix an authenticating seal to; also: AUTHENTICATE, RATIFY b: to mark with a stamp or seal usu. as an evidence of standard exactness, legal size, weight, or capacity, or merchantable quality 3: a: to fasten with or as if with a seal to prevent tampering b: to close or make secure against access, leakage, or passage by a fastening or coating c: to fix in position or close breaks in with a filling (as of plaster) 4: to determine irrevocably or indisputably (that answer ~ed our fate)

**sea lamprey** *n* (1879): a large anadromous lamprey (*Petromyzon marinus*) that has a mottled upper surface, is an ectoparasite of fish, and is sometimes used as food

**sea-lane** \sē-, lān\ *n* (1927): an established sea route

**sea-lant** \sē-, lənt\ *n* (1944): a sealing agent (radiator ~)

**sea lavender** *n* (1597): any of a genus (*Limonium*) of chiefly perennial herbs of the plumbago family with small flowers and basal leaves

**sea lawyer** *n* (1848): an argumentative captious sailor

**sealed-beam** \sē-, əl-(d)-, -bēm\ *adj* (1939): being an electric lamp with a prefocused reflector and lens sealed in the lamp vacuum

**sea legs** *n* *pl* (1712): bodily adjustment to the motion of a ship indicated esp. by ability to walk steadily and by freedom from seasickness

**seal-er** \sē-, lər\ *n* (15c) 1: an official who attests or certifies conformity to a standard of correctness 2: a: coat (as of size) applied to prevent subsequent coats of paint or varnish from sinking in

**sealer** *n* (1842): a person or a ship engaged in hunting seals

**sea lettuce** *n* (1668): any of a genus (*Ulva*) of seaweeds with green fronds sometimes eaten as salad

**sea level** *n* (1806): the level of the surface of the sea esp. at its mean position midway between mean high and low water

**sea lily** *n* (1876): CRINOID; **esp**: a stalked crinoid



sea horse 3

**sealing wax** *n* (14c): a resinous composition warm and is used for sealing (as letters, dry)

**sea lion** *n* (1697): any of several Pacific *Eumetopius* and *Zalophus* that are usu. large and lack a thick underfur

**seal off** *vt* (1931): to close tightly

**seal point** *n* \sē-, pōint\ (the color) (1939): a colored by a cream or fawn body with dark brown cat with such coloring

**seal ring** *n* (1608): a finger ring engraved with seal-skin \sē-, skīn\ *n* (14c) 1: the fur garment (as a jacket, coat, or cape) of sealsk

**Sealy-ham terrier** \sē-, lē-, ham-, esp Brit. brookshire, Wales\ (1907): any of a breed of strong-jawed heavy-boned chiefly white terriers

**seam** \sem\ *n* [ME *seem*, fr. OE *sēam*; al. more at SEW] (bef. 12c) 1: a: the joining; leather by sewing usu. near the edge b: joining 2: the space between adjacent plies a: a line, groove, or ridge formed by the at layer or stratum (as of rock) between distir valuable mineral and esp. coal irrespective by a cut or wound; also: WRINKLE 4: a gap (found a ~ in the zone defense) — **seam** *seams*: ENTIRELY, COMPLETELY (falling apart)

**seam** *vi* (1582) 1: a: to join by sewing b: by welding, riveting, or heat-sealing 2: ing seams ~ *vi*: to become fissured or ridged

**sea-maid** \sē-, mād\ or **sea-maid-en** \-m, -also: a goddess or nymph of the sea

**sea-man** \sē-, mən\ *n* (bef. 12c) 1: SAILOR, three ranks below petty officer in the navy

**seaman** *n* (1542): a sailor

**seaman apprentice *n* (1947): an enlistee, guard ranking above a seaman recruit and t**

**seaman-like** \sē-, mən-, līk\ *adj* (1796): competent seaman

**seaman-ly** \sē-, mən-, lī\ *adj* (1798): SEAMANLIKE

**seaman recruit** *n* (1947): an enlisted man, navy or coast guard

**seaman-ship** \sē-, mən-, ship\ *n* (1766): t working, and navigating a ship

**sea-mark** \sē-, mār-k\ *n* (15c) 1: a line on a 2: an elevated object serving as a beacon to

**sea mew** *n* (15c): SEAGULL; **esp**: a commc of Europe and northwestern No. America

**sea-mile** \sē-, mīl\ *n* (1796): NAUTICAL MILE

**seam-less** \sē-, less\ *adj* (15c) 1: havin; awkward transitions or indications of disj ~ fusion of beauty and intelligence — Jack

**ly-le** *adv* — **seam-less-ness** \-nəs\ *n*

**seam-mount** \sē-, maunt\ *n* (1941): a subm: the deep-sea floor

**sea mouse** *n* (ca. 1520): any of various lar worms (esp. genus *Aphrodite*) covered with

**seam-stress** \sē-, strəs\ *n* (1644): a woman w

**seamy** \sē-, me\ *adj* **seam-i-er**; -est (16c) rough side of the seam showing 2: a: i

**SORDID** — **seam-i-ness** *n*

**seance** \sē-, ān-(t)s, -ās, sē-, ā- \ *n* [F, fr. seoir sit] (1803) 1: SESSION, SITTING 2: a s

**spirit communications**

**sea nettle** *n* (1601): a stinging jellyfish; (*Physalia*) occurring esp. in Atlantic estu

**West Indies**

**sea oats** *n* *pl* but *sing* or *pl* in constr (1 paniculata) that has panicles resembling th on the coast of the southern U.S., and is us

**sea onion** *n* (14c): SQUILL 1a

**sea otter** *n* (1664): a rare marine otter (Ei Pacific coasts that may attain a length of si brown but with lighter coloration on the and feeds largely on shellfish

**sea pen** *n* (1763): any of numerous anth growing in colonies with a feathery form

**sea-piece** \sē-, pēs\ *n* (1656): SEASCAPE 2

**sea plank** (1731) 1: THRIFT 4 2: any of slender No. American herbs of the gentian or white cymose flowers

**sea-plane** \sē-, plān\ *n* (1913): an airplane d land on the water

**sea-porth** \sē-, pōrt, -pōrt\ *n* (1596): a por to seagoing ships

**sea power** *n* (1849) 1: a nation having l

**sea puss** \sē-, pus\ *n* [alter. of dial. *seapoose* (Algonquian language of Long Island) swimming or along shore undertow

**seaquake** \sē-, kwāk\ *n* [sea + earthqua

**sear** *var* of SERE

**sear** \sē-, sē\ *vb* [ME *seren*, fr. OE *sēarian* to (bef. 12c): to cause withering or drying and dry: PARCH 2: to burn, scorch, or i

**sear** *n* (1874): a mark or scar left by sear

**sear** *n* [prob. fr. MF *serre* grasp, fr. *serre* to bolt, latch, fr. L *sera* bar for fastening a holds the hammer of a gun's lock at cock

**search** \sərch\ *vb* [ME *cerchen*, fr. MF